

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
MAURICE JACKSON	:	Violations:
	:	18 U.S.C. § 924(a)(1)(A) (False
	:	statements in purchase of firearms-
	:	9 counts);
	:	18 U.S.C. § 924(d) (Notice of
	:	forfeiture)

**INDICTMENT**

**COUNTS ONE THROUGH NINE**

THE GRAND JURY CHARGES THAT:

1. At all times material to this indictment, the following companies and individuals possessed a federal firearms license (“FFL”) and were authorized to deal in firearms under federal law:

- a. Morton Pomerantz located at 406 Broad Street in Milford, Pennsylvania;
- b. C & C Sports Center located at 101 Geiger Road in Philadelphia,  
Pennsylvania;
- c. Archery & Gun Outfitters located at 674 Bethlehem Pike in  
Montgomeryville, Pennsylvania;
- d. Delia’s Gun Shop located at 6104 Torresdale Avenue in Philadelphia,  
Pennsylvania;
- e. Lock’s Philadelphia Gun Exchange located at 6700 Rowland Avenue in

Philadelphia, Pennsylvania; and

f. Mike and Kate's Sport Shoppe located at 7492 Oxford Avenue in Philadelphia, Pennsylvania.

2. On or about December 19, 1999, Morton Pomerantz sold firearms at the Valley Forge Gun Show held in Valley Forge, Pennsylvania.

3. FFL holders were licensed, among other things, to sell firearms and ammunition. Various rules and regulations promulgated under the authority of Title 18, United States Code, Chapter 44 (Sections 921-929), govern the manner in which an FFL holder may sell firearms and ammunition.

4. The rules and regulations governing FFL holders required that a person seeking to purchase a handgun fill out a "Firearms Transaction Record," ATF Form 4473. Part of the Form 4473 required that the prospective purchaser certify truthfully, subject to penalties of perjury, that he was the actual buyer of the firearm. The Form 4473 contained language warning that "[t]he federal firearms laws require that the individual filling out this form must be buying the firearm for himself or as a gift. Any individual who is not buying the firearm for himself/herself or as a gift, but who completes this form, violates the law."

5. FFL holders were required to maintain a record, in the form of a completed Form 4473, of the identity of the actual buyer of firearms sold by the FFL holder.

6. On or about the dates specified below, in the Eastern District of Pennsylvania and elsewhere, defendant

MAURICE JACKSON,

in connection with the acquisition of the firearms listed below from the federally licensed dealers listed below, knowingly made a false statement and representation with respect to the information required by the provisions of Title 18, United States Code, Chapter 44, to be kept in the records of a federally licensed firearms dealer, in that the defendant falsely represented on Form 4473 that he was the actual buyer of the firearms described below, when, in fact, the defendant knew those representations to be false.

COUNT	DATE	FFL	FIREARM(S) PURCHASED	SERIAL NUMBER
1	December 19, 1999	Morton Pomerantz 406 Broad Street Milford, PA	1 Full Metal Jacket Cobray .9mm semi- automatic pistol, model PM 11	940011950
2	January 10, 2000	C & C Sports Center 101 Geiger Road Philadelphia, PA	1 EAA Witness .45 caliber pistol  1 Smith & Wesson Sigma .40 caliber pistol	AE45478  PBD4217
3	April 12, 2000	C & C Sports Center 101 Geiger Road Philadelphia, PA	1 Israeli Military Industries (IMI) Desert Eagle .9mm semi-automatic pistol	99312051
4	May 10, 2000	C & C Sports Center 101 Geiger Road Philadelphia, PA	1 Israeli Military Industries (IMI) Baby Eagle .9mm semi- automatic pistol	99312099

5	January 16, 2001	Archery & Gun Outfitters 674 Bethlehem Pike Montgomeryville, PA	1 Taurus .45 caliber pistol, model PT945,  1 Daewoo .9mm semi-automatic pistol, model DP51  1 Full Metal Jacket HiPower .9mm semi- automatic pistol	NRD95242  14815  388644
6	January 17, 2001	Delia's Gun Shop 6104 Torresdale Avenue Philadelphia, PA 19135	1 Smith & Wesson 3913 .9mm semi- automatic pistol  1 Colt System 1927 .45 caliber pistol  1 Tanfoglio Witness .9mm semi-automatic pistol	EKZ2019  77343  EA10591
7	January 19, 2001	Lock's Philadelphia Gun Exchange 6700 Rowland Avenue Philadelphia, PA 19149	1 Smith & Wesson 59 .9mm semi-automatic pistol  1 Smith & Wesson 59 .9mm semi-automatic pistol  1 Excam TA90 .9mm semi-automatic pistol	A465505  A334274  624761
8	January 25, 2001	Mike & Kate's Sport Shoppe 7492 Oxford Avenue Philadelphia, PA 19111	1 Ruger .9mm semi- automatic pistol, model P95	31378583

9	February 8, 2001	Delia's Gun Shop 6104 Torresdale Avenue Philadelphia, PA 19135	1 Smith & Wesson 6904 .9mm semi- automatic pistol,  1 Auto Ordinance General, .45 caliber pistol	TCY 6436  TGM 6496
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All in violation of Title 18, United States Code, Section 924(a)(1)(A).

## **NOTICE OF FORFEITURE**

1. As a result of the violations of Title 18, United States Code, Section 924(a)(1)(A), as set forth in Counts One through Nine of this Indictment, defendant

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shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Codes, Section 2461(c), the firearms involved in the commission of these offenses, including, but not limited to:

- (a) Full Metal Jacket (FMJ) Cobray .9mm semi-automatic pistol, smodel PM 11 serial no. 940011950;
- (b) EAA Witness .45 Pistol, serial no. AE45478;
- (c) Smith & Wesson Sigma .40 Pistol, serial no. PBD4217;
- (d) Israeli Military Industries (IMI) Desert Eagle .9mm semi-automatic pistol, serial no. 99312051;
- (e) Israeli Military Industries (IMI) Baby Eagle .9mm semi-automatic pistol, serial no. 99312099;
- (f) Taurus .45 caliber pistol, model PT945, serial no. NRD95242;
- (g) Daewoo .9mm semi-automatic pistol, model DP51, serial no.14815;
- (h) Full Metal Jacket (FMJ) HiPower .9mm semi-automatic pistol, serial no. 388644;
- (i) Smith & Wesson 3913 .9mm semi-automatic pistol, serial no. EKZ2019;
- (j) Colt System 1927 .45 caliber pistol, serial no. 77343;
- (k) Tanfoglio Witness .9mm semi-automatic pistol, serial no. EA10591;

- (l) Smith & Wesson 59 .9mm semi-automatic pistol, serial no. A465505;
- (m) Smith & Wesson 59 .9mm semi-automatic pistol, serial no. A334274;
- (n) Excam TA90 .9mm semi-automatic pistol, serial no. 624761;
- (o) Ruger .9mm semi-automatic pistol, model P95, serial no. 31378583;
- (p) Smith & Wesson 6904 .9mm semi-automatic pistol, serial no. TCY 6436;
- (r) Auto Ordinance General .45 caliber pistol, serial no. TGM 6496.

All pursuant to Title 18, United States Code, Section 924(d).

A TRUE BILL:

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FOREPERSON

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PATRICK L. MEEHAN  
United States Attorney